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Director



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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October 3, 1989

Mr. Dean Fowler  
Colbert Landfill Project Manager  
Spokane County Public Works Building  
North 811 Jefferson Street  
Spokane, Washington 99260-0180

RE: Comments on Draft Plan for Institutional Controls for the Colbert  
Landfill dated August 30, 1989

Dear Dean:

The following are the comments from Ecology, EPA, and Spokane County Health District regarding the above stated plan prepared by Landau Associates. As stated in the Colbert Scope of Work, Spokane County shall develop and implement a plan to prevent human access to the landfill. The plan as submitted does that, but we do have the following comments to help make it a better plan.

Page 1-2 Last paragraph (change): Subsequent to ~~implementation~~  
issuance of the ROD, ..... The implementation of the ROD is just beginning.

Page 2-7 Second Paragraph (add): County personnel will inspect the landfill on a monthly basis to evaluate the condition of the soil cover and the effectiveness of the perimeter access controls and posted notices. A written report of the each inspection shall be submitted to Ecology, EPA, and the Spokane County Health District to insure that the monthly inspections have occurred. If the County determines.....

Section 2-3 Proposed Access Controls (add): A sign shall be erected at the gate(s) to warn/notify people that the landfill is closed, dumping of garbage is not allowed, where the nearest landfill or drop box is, and who to contact if they have questions regarding the landfill. The sign should also state that dumping of garbage subjects them to a fine.

Section 3.0 Schedule (question): Is it possible for a Spokane County crew (County employees) to do the needed work on the berms and/or ditches and to erect the signs, rather than going to an outside construction contractor? It seems that the work could easily be done with a backhoe to build berms or to excavate ditches. Signs can be posted on steel fence post pounded into the ground with a sledge hammer or forced into the ground with the bucket on a backhoe. We suggest this approach as a way to save money and time.

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If you have any questions regarding the above comments, please give me a call at (206)438-3043.

One additional note regarding the issue of institutional controls and the installation of new purveyor wells, which is outside the scope of the submitted plan. As we discussed many weeks ago, you were going to discuss the issue with Jim Emacio and Jerry Neal to get their input. Ecology and EPA does expect a written response as to how Spokane County would implement controls on new wells, or why the County is unable to do so. We would like to receive your written response by November 3, 1989. I have also discuss this matter with Steve Holderby of the Health District and have asked him to do some research on the issue. You and Steve may wish to discuss the County's ability/authority to restrict new wells in the Colbert area.

Sincerely,

*Mike Blum*

Mike Blum, Project Manager  
Landfill Site Cleanup Section  
Hazardous Waste Investigations and  
Cleanup Program

MB:clr

cc: Larry Beard, Landau Associates  
Steve Holderby, Spokane County Health District  
Neil Thompson, EPA  
Jim Emacio, Esq., Spokane County Prosecutor's Office  
Jerry Neal, Esq., Preston, Thorgrimson, Ellis, & Holman